

**GOTTLIEB & ASSOCIATES**  
ATTORNEYS

**150 E. 18<sup>th</sup> St., Suite PHR • New York, NY 10003**  
**Tel (212) 228-9795 • Fax (212) 982-6284**  
**NYJG@aol.com**

March 30, 2022

**VIA ECF**

The Honorable John G. Koeltl  
United States District Judge  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: *Roman v. Greenwich Village Dental Arts P.C., et al.*,  
Case No.: 1:21-cv-5939

Dear Judge Koeltl,

The undersigned represents Juan Roman, (“Plaintiff”) in the above referenced matter against Defendants, Greenwich Village Dental Arts P.C., and Advanced Dental Arts, P.C. (collectively referred to as “Defendant”). We write to respectfully submit the enclosed Notice of Supplemental Authority with Exhibit “A” annexed thereto in connection with the Opposition to Defendant’s Motion to Dismiss that was submitted on March 25, 2022 (Dkt. 26). We thank the Court for its time and consideration of Plaintiff’s application.

Respectfully submitted,

**GOTTLIEB & ASSOCIATES**

/s/Michael A. LaBollita, Esq.

Michael A. LaBollita, Esq.

cc: all counsel of record VIA ECF

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- x  
JUAN ROMAN, ON BEHALF OF HIMSELF  
AND ALL OTHER PERSONS SIMILARLY  
SITUATED,

Plaintiffs,

v.

GREENWICH VILLAGE DENTAL ARTS P.C.,  
AND ADVANCED DENTAL ARTS, P.C.,

Defendants.  
----- x

No.: 1:21-cv-5939

NOTICE OF SUPPLEMENTAL  
AUTHORITY

**NOTICE OF SUPPLEMENTAL AUTHORITY IN SUPPORT OF PLAINTIFFS  
OPPOSITION TO DEFENDANT’S MOTION TO DISMISS**

Plaintiff Juan Roman, on behalf of himself and all other persons similarly situated (“Plaintiff”) respectfully submits this Notice of Supplemental Authority to bring to the Court’s attention a decision issued after the submission of its Memorandum of Law in Opposition to Defendant’s Motion To Dismiss in the above matter filed on March 25, 2022 (Dkt. 26): *Sanchez v. NutCo, Inc.*, 2022 US Dist LEXIS 51247 [SDNY Mar. 22, 2022, No. 20-CV-10107 (JPO)]. (Exhibit “A”). The Court in *Sanchez* denied the Defendant’s Motion to Dismiss holding that Sanchez had satisfied the standing requirements because he suffered a past injury tethered to a violation of the ADA due to known barriers on the website that was traceable to NutCo's failure to make the Website accessible, there was a real and immediate threat of Sanchez experiencing a future injury and like the instant matter, the injury due to the website’s barriers to accessibility is likely to be redressed by a favorable judicial decision.